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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Surface Water Quality Bureau

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DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

JAMES H. DAVIS, Ph.D.
Director
Resource Protection Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 24, 2012

Mr. James Wallace, Vice President
PESCO, Inc.
PO Box 929
Farmington, NM 87401

Re: Industrial Storm Water, SIC 3443, NPDES Compliance Evaluation Inspection, Process Equipment and Service Company, Inc., NMR05GD95, October 17, 2012

Dear Mr. Wallace,

Enclosed please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas, for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report, and required to correct any problems noted during the inspection and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify, in writing, both USEPA (Diana McDonald, USEPA (6EN-WM), 1445 Ross Ave., Dallas, Texas 75202) and NMED (at above address) regarding modifications and compliance schedules.

The NPDES Storm Water Multi-Sector General Permit for Industrial Activities (MSGP-2008) was reissued on September 29, 2008. The MSGP, fact sheet and other information on the industrial storm water program can be downloaded at <http://cfpub2.epa.gov/npdes/stormwater/msgp.cfm>.

Thank you for the cooperation and assistance that Mr. Rod Troxell provided during my visit to your site. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 222-9587.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb

Environmental Scientist/Specialist

Surface Water Quality Bureau

Cc: Hannah Branning, USEPA (6EN-AS) via email
Rashida Bowlin, USEPA (6EN-AS) via email
Carol Peters-Wagnon, USEPA (6EN-WM) via email
Diana McDonald, USEPA (6EN-WM) via email

Darlene Whitten-Hill, USEPA, via email
Bob Italiano, NMED District II Manager, via email



NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 N M R 0 5 G D 9 5 11 12 1 2 1 0 1 7 17 18 ~ 19 S 20 2					
Remarks					
S E C T O R A A					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 3	71 N	72 N	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) PESCO, INC., SAN JUAN COUNTY: FROM HWY 550 IN BLOOMFIELD, HEAD WEST ON HWY 64. PESCO IS LOCATED APPROXIMATELY 7.5 MILES WEST OF BLOOMFIELD ON THE NORTH SIDE OF HWY 64.	Entry Time /Date 0840 HOURS / 10-17-2012	Permit Effective Date 9-29-2008
	Exit Time/Date 1130 HOURS / 10-17-2012	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. ROD TROXELL, HS&E MANAGER (505) 327-2222	Other Facility Data SIC 3443 GPS: N. 36° 42' 18" W. -108° 06' 27"	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. BLAKE WALLACE, VP OF FACILITIES AND ASSEMBLY OPERATIONS (505) 327-2222 PO BOX 929, FARMINGTON, NM 87401	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	M	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- INSPECTOR ARRIVED ONSITE AT 0840 HOURS ON OCTOBER 17, 2012 AND CONDUCTED AN ENTRANCE INTERVIEW WITH MR. ROD TROXELL, HS&E MANAGER, WHERE SHE MADE INTRODUCTIONS, PRESENTED CREDNETIALS AND EXPLAINED THE PURPOSE OF THE INSPECTION. AN EXIT INTERVIEW WAS CONDUCTED FROM APPROXIMATELY 1115-1130 HOURS WITH MR. TROXELL AND MR. BLAKE WALLACE, VP OF FACILITIES, AT THE SITE THAT SAME DAY.
- PLEASE SEE REPORT FOR FURTHER INFORMATION.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-222-9587	Date 10-24-2012
Signature of Management QA Reviewer Richard Powell /s/ Richard Powell	Agency/Office/Phone and Fax Numbers 505-827-2798	Date 10-23-2012

NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>		<u>General</u>	
Inspection Type	CEI	Inspector Name	Sarah Holcomb
NPDES ID Number	NMR05GD95	Telephone	505-222-9587
Inspection Date	10-17-2012	Entry Time	0840 hours
Inspector Type <i>(circle one)</i>	EPA <input type="checkbox"/> State EPA Oversight	Exit Time	1130 hours
Facility Sector/ SIC/Activity Code	Sector AA/ SIC 3443	Signature	<i>/s/ Sarah Holcomb</i>

<u>Facility Location Information</u>			
Name/Location/ Mailing Address	PESCO, Inc. 7.5 miles west of Bloomfield on Hwy 64. Mailing address: PO Box 929, Farmington, NM 87401		
GPS Coordinates	Latitude	N. 36° 42' 18"	Longitude W. -108° 06' 27"
Receiving Water(s)	Echo Ditch, thence to the San Juan River in 20.6.4.408 NMAC		

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	PESCO, Inc.	
Facility Contact	Mr. Rod Troxell, HS&E Manager	505-327-2222
Authorized Official(s)	Mr. Blake Wallace, VP of Facilities	505-327-2222

<u>Basic Permit Information</u>			<u>Basic SWPPP Information</u>		
Permit Coverage	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N		SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Permit Type	<input checked="" type="checkbox"/> General <input type="checkbox"/> Individual		SWPPP Contents Satisfactory	Y	<input type="checkbox"/> N
Operational Date	1979		SWPPP Implementation Satisfactory	Y	<input type="checkbox"/> N
NOI/Application Date	1-15-2009		SWPPP Date	12-31-08	
If applicable, is no exposure certification on file?	Y <input type="checkbox"/> N		<i>Intentionally left blank</i>		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
<u>General</u>	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/>	N	
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/>	N	
Copy of the permit language?	<input checked="" type="checkbox"/>	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	<input checked="" type="checkbox"/>	N	
<p>Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)?</p> <p>Applicable to:</p> <ul style="list-style-type: none"> • Routine facility inspection (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3). 	Y	N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	N	N/A
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/>	SWPPP states that a T&E species list was obtained prior to building the facility, but did not include a current list.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	<input checked="" type="checkbox"/>	SWPPP states there is no effect on historic properties, but no list is included in the plan.
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	N/A
Did all "operators" sign/certify the SWPPP?	Y	<input checked="" type="checkbox"/>	SWPPP was unsigned but Mr. Wallace signed on the day of this inspection.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/>	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/>	N	Manufacturing of industrial oil and gas equipment through welding and grinding, pipe fitting, steam cleaning, shot blasting and painting.
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input checked="" type="checkbox"/>	N	
Is there a site specific site map?	<input checked="" type="checkbox"/>	N	
Does the site map contain the size of the property in acres?	Y	<input checked="" type="checkbox"/>	Site is 20 acres.
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/>	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	Y	<input checked="" type="checkbox"/>	San Juan River is about 0.4 miles away from the site. This information was not included on the map.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	N	N/A – no spills or leaks have occurred in the last three years according to facility representatives.
Does the site map contain locations of all storm water monitoring points?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	Y	<input checked="" type="checkbox"/>	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	<input checked="" type="checkbox"/>	2010 Census information indicates that the MS4 boundary is across Hwy 64 from the facility. This should be included on the map.
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	N	N/A – no non stormwater discharges.
Does the site map contain locations of the following activities where these	Y	<input checked="" type="checkbox"/>	Vehicle and equipment maintenance is done onsite, indoors, but not indicated on the site map.

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
activities are exposed to precipitation? • Fueling stations N • Vehicle and equipment maintenance and/or cleaning areas N/A • Loading/unloading areas Y • Locations used for the treatment, storage or disposal of wastes Y • Liquid storage tanks Y • Processing and storage areas Y • Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility Y • Transfer areas for substances in bulk Y • Machinery Y			
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	Y	<input type="checkbox"/> N	Facility representative indicated that he would start sampling run-on to see if it contained pollutant loads of concern.
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	Y	N	N/A – materials are stored outside, exposed to stormwater, but no non-stormwater discharges are released from these areas.
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	<input checked="" type="checkbox"/> Y	N	All manufacturing is done indoors but for the steam testing and outdoor storage.
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	Y	N	N/A - No leaks or spills have occurred at the site in the past three years according to facility representatives.

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> • Date • Description of evaluation criteria • List of the outfalls or onsite drainage points directly observed • Different types of non-storm water discharges and source locations • Actions taken such as a list of control measures for elimination. 	<input checked="" type="checkbox"/>	N	Rod Troxell and Leroy Miller conducted the inspection on 12-23-2008. No non-stormwater discharges were observed.
Does salt storage occur at this facility?	Y	<input checked="" type="checkbox"/>	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	<input checked="" type="checkbox"/>	N	Under the past (2000) permit, 5 exceedances of the benchmark limit were noted for both zinc and nitrate-nitrogen.
<u>Controls to Reduce Pollutants</u>		Notes:	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	<input checked="" type="checkbox"/>	N	Visual tank inspections are conducted monthly and the trench drain (steam pad) is inspected yearly.
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	<input checked="" type="checkbox"/>	N	Manufacturing facilities are swept each night to prevent metal fines from escaping to the outdoors. Material containers are labeled and organized.

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	<input checked="" type="checkbox"/> Y	N	On an as-needed basis.
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include a schedule for preventative maintenance procedures?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	<input checked="" type="checkbox"/> Y	N	Building earthen berms, using absorbent materials, backup containment, cleanup, notification if needed.
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	<input checked="" type="checkbox"/> Y	N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input checked="" type="checkbox"/> Y	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> Y	N	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	<input checked="" type="checkbox"/> Y	N	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/>	N	SWPPP documents grading to contain/channelize runoff. Mentions site is watered down to prevent dust occasionally.
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	Y	<input checked="" type="checkbox"/>	SWPPP states that most runoff is captured by the greenbelt in front of the facility, however, there is a significant portion of the site that drains to a ditch in the middle of the site.
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	Y	<input checked="" type="checkbox"/>	
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	Y	N	N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/>	N	Yearly.
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	<input checked="" type="checkbox"/>	N	
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input checked="" type="checkbox"/>	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/>	N	Gravel applied at the eastern end of the site to prevent trackout.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/>	N	Hydro testing is done within a closed loop system. Steam pad cleaning area is contained by walls and a sloped working area, which drains to holding tanks.

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

This facility manufactures oil and gas equipment, specifically separators, dehydrators and heater treaters, as well as tanks. The facility also maintains and repairs the equipment they sell. The facility was previously covered under the 2000 MSGP under tracking number NMR05B068.

The facility did not have specific endangered species or historic properties information in their SWPPP. The plan indicated that the lists had been checked prior to the construction of the facility in 1979, but there was no indication that the list have been updated since that time. According to <http://www.fws.gov/southwest/es/NewMexico/SBC.cfm>, San Juan County contains 25 species that are either endangered or sensitive. <http://criticalhabitat.fws.gov/crithab/> is also where you can find critical habitat areas for these species. You can access up to date historic properties information at: <http://www.nmhistoricpreservation.org/arms.html>

The permit requires that routine facility inspections are conducted as per Part 4.1.1, which states: *Routine facility inspections must be conducted at least quarterly.* There was documentation that one inspection had been conducted in 2010, 4 in 2011 and 2 in 2012.

The permit also requires in Part 4.2 that visual assessments are done of stormwater runoff. There was no documentation of any visual assessments having been completed over the term of this permit.

One comprehensive annual inspection and annual report had been completed in 2010, but nothing had been completed for 2011. The inspector strongly recommended that the 2011 report and information be completed and sent to EPA as soon as possible. On the 2010 report, Mr. Troxell signed the report and certification statement. The permit states in Appendix B.11 that signatures on applications and other paperwork pertaining to the permit must be signed by a corporate official. Signatures on SWPPPs and inspection reports can be delegated by the corporate official by signing a delegation letter which is included in the SWPPP.

A review of the benchmark sampling information obtained during this permit term is summarized in Appendix A to this report. Please review Appendix B (facility site map) for indications of outfalls sampled at the site. There are regular benchmark exceedances from the site for Nitrate-Nitrite. A benchmark exceedance is not necessarily a permit violation, but an indication that BMPs at the site need to be reassessed. The facility representatives were unsure where the nitrogen would be coming from at the site. Referencing the 1995 MSGP (which contains much information about where the benchmark limits originally came from, and where it lists possible sources for contaminants), it indicated that surface metal treatments could be a source of nitrogen. The facility stores all of their raw materials outdoors at the eastern end of their site, which may explain the exceedances at Outfalls 001 and 002. The final products are stored outside nearer the southwestern and western ends of the site, but these are usually painted and shouldn't be a source of nitrogen. However, there is used equipment that comes in for repair or resale, and if the equipment is not in pristine shape, this could be another source of nitrogen at this end of the site.

There are also regular benchmark exceedances for Aluminum (14 exceedances), Iron (11 exceedances) and zinc (6 exceedances), although according to the data, it appeared that efforts to sweep up metal fines in the shops and keeping those manufacturing activities contained has helped over time. Please see the attached sampling summary for more detail.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>	Notes:		
Routine Facility Inspections			
Are routine facility inspections conducted at least quarterly while facility operating?	Y	<input checked="" type="checkbox"/> N	
Are inspections documented, including: <ul style="list-style-type: none"> • Date and time • Name and signature of inspector • Weather information and a description of discharge occurring at the time of the inspection • Previously unidentified discharges from site • Control measures needing maintenance or repairs • Failed control measures that need replacement • Incidents of noncompliance observed • Additional control measures needed. 	Y	<input checked="" type="checkbox"/> N	Weather information was not documented, but the rest of the information required was on the inspection form.
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> • Inactive and unstaffed sites 	Y	N	N/A
Quarterly Visual Assessment			
Are quarterly visual assessments conducted?	Y	<input checked="" type="checkbox"/> N	There was no documentation of quarterly visual inspections ever being conducted.
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Collected in a clean, clear glass or plastic container. 	Y	<input checked="" type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Inspections		
Are assessments documented, including: <ul style="list-style-type: none"> • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes. 	Y	<input checked="" type="checkbox"/> N
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites. 	Y	<input checked="" type="checkbox"/> N
Comprehensive Site Inspections		
Are comprehensive site inspections conducted annually (start 9/29/08)?	Y	<input checked="" type="checkbox"/> N
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	<input checked="" type="checkbox"/> Y	N
Cover all areas of the facility?	<input checked="" type="checkbox"/> Y	N
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	<input checked="" type="checkbox"/> Y	N

NPDES Industrial Storm Water Checklist (MSGP)

Inspections		
<p>Include observations of the following:</p> <ul style="list-style-type: none"> • Industrial materials, residue, or trash that may have or could come into contact with storm water • Leaks or spills from industrial equipment, drums, tanks, and other containers • Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site • Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas • Control measures needing replacement, maintenance, or repair • All storm water control measures observed. 	<input checked="" type="checkbox"/>	N
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> • Date of inspection • Names and titles of personnel making the inspection • Findings from examination of areas of facility from Part 4.3.1 • All observations relating to implementation of control measures • Any required revisions to the SWPPP resulting from inspection • Any incidents of noncompliance identified OR certification that facility is in compliance with the permit • A statement signed in accordance with Appendix B, Subsection 11 	<input checked="" type="checkbox"/>	<p>Mr. Troxell signed the inspection report in 2010, but there was no designation letter in the SWPPP to allow him to do so.</p>

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
<u>General</u>	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	<input type="checkbox"/> N	N/A
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	<input type="checkbox"/> N	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	<input checked="" type="checkbox"/> N	Method documented is EPA Method 6010B or 3050B, which are not contained in 40 CFR 136 as approved.
Benchmark Monitoring			
<p>Does the monitoring consist of a sample collected:</p> <ul style="list-style-type: none"> • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge Y • Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall N • Prior to commingling. Y 	Y	<input checked="" type="checkbox"/> N	Difficult to tell if samples were collected within first 30 minutes of discharge.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	<input checked="" type="checkbox"/> N	Irregular rainfall. 1 sample collected in 2008, 2 in 2009, 1 in 2010, 1 in 2011.
Is the average of the first four quarterly samples < the parameter benchmark?	Y	<input checked="" type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
Is the average of the first four quarterly samples > the parameter benchmark? <ul style="list-style-type: none"> Make the necessary modifications N Continue quarterly monitoring Y Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA N Natural background pollutant level documentation N 	<input checked="" type="checkbox"/>	N	
Exceptions, including (see 6.1 & 6.2): <ul style="list-style-type: none"> Adverse weather conditions Climates with irregular storm water runoff Snowmelt Substantially identical outfalls (per 5.1.5.2) Inactive and unstaffed sites. 	<input checked="" type="checkbox"/>	N	Exception for irregular stormwater runoff documented in SWPPP.
Effluent Limitations Monitoring			
Sampled once per year?	Y	N	N/A
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	N/A
Other Required Monitoring			
<ul style="list-style-type: none"> State or Tribal provisions Discharges to impaired waters Additional monitoring required by EPA. 	Y	N	N/A
Reporting (Part 7)			
<u>General</u>		Notes:	
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	<input checked="" type="checkbox"/>	No documentation in the SWPPP that monitoring results were sent to EPA.
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	<input checked="" type="checkbox"/>	In 2010, yes. No report had been submitted for 2011.
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?	Y	N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff	<p><i>(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system)</i></p> <p>All manufacturing processes are conducted indoors and under cover. All tanks have secondary containment. All washwater and testing water is either contained and disposed of via hauler, or is contained within a closed loop system and recycled.</p>
Good Housekeeping	<p><i>(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)</i></p> <p>Facility picks up trash on site ASAP and disposes in a dumpster. The dumpster was not covered at the time of this inspection, but facility representative indicates that it normally is. Sweeping occurs daily in the shops to ensure metal fines do not travel outdoors.</p>
Preventative maintenance	<p><i>(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)</i></p> <p>PM inspections occur on a regular basis and are documented in the SWPPP.</p>

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>Spill response is covered in training employees receive. Absorbents and booms are kept onsite and readily accessible.</p>
Erosion and Sediment Controls	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>Grading has been implemented to direct runoff. Facility does site watering seasonally and as needed to deal with dust. Stabilized entrance in the form of road base prevents trackout.</p>

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Management of Runoff	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>There is no active management of runoff to infiltrate or reduce the amount running off.</p>
Salt Storage Piles	<p><i>(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)</i></p> <p>N/A</p>

SWPPP Implementation	
Waste, Garbage and Floatable Debris	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>Garbage pickup is conducted continuously and is disposed of immediately. Site was very clean at the time of this inspection.</p>
Evidence of non-storm water discharges	<p>No non-stormwater discharges were observed at the time of this inspection.</p>
Dust Generation and Vehicle Tracking of Industrial Materials	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>No “trackable” industrial materials were observed outside on the day of this inspection and the base course appeared to prevent dust trackout onto Hwy 64.</p>

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Notes on SWPPP Implementation and Sector Specific Requirements

List and describe structural controls *(The selection, design, installation, and implementation of these control measures must be in accordance with good engineering practices and manufacturer's specifications)*

There were no stormwater specific structural controls in place at the time of this inspection. Facility representatives indicated that a stormwater pond might be a viable installation in the future to help contain some runoff.

Monitoring Date	Analyte/Outfall Number	Result (mg/L)	Benchmark value	Monitoring Date	Analyte/Outfall Number	Result (mg/L)	Benchmark value
12/23/2008	Nitrate/001	2.9	0.68	1/19/2010	Nitrate/001	0.6	0.68
	Nitrate/002	0.6	0.68		Nitrate/002	0.6	0.68
	Nitrate/003	0.6	0.68		Nitrate/003	0.4	0.68
	Aluminum/001	0.591	0.75		Nitrate/004	0.3	0.68
	Aluminum/002	1.39	0.75		Aluminum/001	0.959	0.75
	Aluminum/003	0.973	0.75		Aluminum/002	0.372	0.75
	Iron/001	ND	1		Aluminum/003	1.49	0.75
	Iron/002	0.054	1		Aluminum/004	0.449	0.75
	Iron/003	ND	1		Iron/001	1.14	1
	Zinc/001	0.182	0.117		Iron/002	0.467	1
	Zinc/002	0.214	0.117		Iron/003	1.92	1
	Zinc/003	0.121	0.117		Iron/004	0.861	1
10/21/2009	Nitrate/001	1.7	0.68		Zinc/001	0.008	0.117
	Nitrate/002	1.2	0.68		Zinc/002	ND	0.117
	Nitrate/003	0.4	0.68		Zinc/003	0.087	0.117
	Aluminum/001	11.2	0.75		Zinc/004	ND	0.117
	Aluminum/002	10.1	0.75	10/4/2011	Nitrate/001	1.5	0.68
	Aluminum/003	11.7	0.75		Nitrate/002	0.9	0.68
	Iron/001	13	1		Nitrate/003	1.2	0.68
	Iron/002	10.7	1		Nitrate/004	0.9	0.68
	Iron/003	11.5	1		Aluminum/001	1.56	0.75
	Zinc/001	0.323	0.117		Aluminum/002	1.31	0.75
	Zinc/002	0.378	0.117		Aluminum/003	3.63	0.75
	Zinc/003	0.435	0.117		Aluminum/004	3.81	0.75
6/26/2009	Nitrate/001	2.1	0.68		Iron/001	1.06	1
	Nitrate/002	1.4	0.68		Iron/002	1.04	1
	Nitrate/003	1.5	0.68		Iron/003	0.371	1
	Aluminum/001	16.4	0.75		Iron/004	1.21	1
	Aluminum/002	7.34	0.75		Zinc/001	0.052	0.117
	Aluminum/003	14.5	0.75		Zinc/002	0.112	0.117
	Iron/001	42.1	1		Zinc/003	0.008	0.117
	Iron/002	8.23	1		Zinc/004	0.03	0.117
	Iron/003	19.1	1				
	Zinc/001	0.77	0.117				
	Zinc/002	0.285	0.117				
	Zinc/003	0.406	0.117				